

**BY ORDER OF THE COMMANDER,
PACIFIC AIR FORCES**



PACAF INSTRUCTION 32-7001

24 APRIL 2000

Civil Engineering

**ENVIRONMENTAL INCIDENT
INVESTIGATION BOARD (EIIB)
PROCEDURES**

COMPLIANCE WITH THIS PUBLICATION IS MANDATORY

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OPR: HQ PACAF/CEVQ
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Supersedes PACAFI 32-7001, 24 February 1999

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Pages: 7
Distribution: F

This instruction implements Air Force Policy Directive 32-70, *Environmental Quality* and AFI 32-4002, *Hazardous Material Emergency Planning and Response Compliance*. It identifies requirements for investigating current environmental incidents to determine cause and prevent recurrence. It applies to all PACAF installations. The Wing/Installation Commander will abide by this instruction regardless of who causes an environmental incident. This publication does not apply to the Air National Guard (ANG) or the Air Force Reserves (AFRES) and their units.

SUMMARY OF REVISIONS

This instruction was rewritten to incorporate changes adopted by a HQ PACAF working group and recommended changes received throughout the year from PACAF installations. A bar (|) indicates revision from the previous edition.

1. Objective: Environmental incidents are evaluated to determine cause and to provide recommended corrective actions to prevent their recurrence. Through the use of the Environmental Notice to Airmen (NOTAM), lessons learned are distributed throughout the Air Force to ensure bases take the necessary steps to prevent a similar incident at their installation.

2. Concept: The Wing/Installation Commander will assign an Environmental Incident Investigation Board (EIIB) for all Category 1, 2, and 3 incidents. Wing/Installation Commander will decide if Category 4 incidents warrant an EIIB. The category of incident will determine the level of investigation and reporting. The incident should be investigated thoroughly to ascertain the cause of the incident and provide positive feedback to the Command to prevent recurrence. The EIIB prepares an incident report and draft NOTAM, and submits them through the Wing/Installation Commander. The Wing/Installation Commander ensures the incident report is forwarded to HQ PACAF. The EIIB Chairman will brief Category 1 incidents to PACAF/CEV. HQ PACAF will issue an environmental NOTAM based on the findings of the

EIIB. The NOTAM is sent to all applicable offices Air Force-wide and will contain lessons learned and recommendations to prevent recurrence. NOTE: If the incident was considered a “Major Accident” under the guidelines of AFI 32-4001, Disaster Preparedness Planning and Operations, units will also submit the After-Actions Lessons Learned Report specified in Attachment 4 of AFI 32-4001.

2.1. Natural disasters, or other Acts of God which directly cause environmental incidents and/or releases, do not generally require investigation under EIIB procedures. However, if a response to an environmental incident caused by Acts of God is poorly managed, or systems fail to function as designed and mitigation of the environmental release is not done, then an EIIB may be required. Consult with HQ PACAF/CEV for a decision on whether EIIB is required after a natural disaster caused incident and/or release.

3. HQ PACAF Responsibilities:

3.1. PACAF/CV will determine if corrective actions proposed by EIIB are sufficient to prevent recurrence and/or ensure effective response to similar situations.

3.2. HQ PACAF/CE will:

3.2.1. Develop policy, procedures, and guidance for the EIIB process.

3.2.2. Distribute lessons learned and recommendations to prevent recurrence to applicable offices Air Force-wide.

3.2.3. Maintain a record of each environmental incident for three years.

3.2.4. Review/approve requests for waivers or extensions to EIIB process.

4. Wing/ Installation Commander Responsibilities:

4.1. Determine the incident category in accordance with, [Figure 1](#).

4.2. Ensure the wing Staff Judge Advocate, Public Affairs, and local detachment of the OSI are notified and jointly clear the incident site and/or background data before any environmental investigation proceeds.

4.3. Appoint EIIB members for Category 1, 2, and 3 incidents based on, [Figure 2](#).

4.4. Determine within 24 hours if Category 4 incidents warrant an EIIB then, appoint EIIB members as needed, based on, [Figure 2](#).

4.5. Ensure an incident report is submitted to HQ PACAF and the Numbered Air Force within 14 days of a completed incident investigation. Submittal can be accomplished via fax followed by hard copy via regular mail.

4.6. Will attend, or have Vice/Deputy Commander attend briefing to HQ PACAF/CV on Category 1 incidents.

5. Environmental Incident Investigation Board (EIIB) Responsibilities:

5.1. Conduct an investigation to determine the chain of events leading to the incident and identify key processes that failed resulting in the incident. The EIIB has 14 days to investigate the incident.

5.1.1. Coordinate activities with the Accident Investigation Board, if the incident was part of a larger major accident situation.

5.1.2. Cease investigation pending the outcome of any OSI and SJA investigation, if data and/or information is discovered during the EIIB evaluation that may interfere with or otherwise subvert any on-going or future OSI investigation.

5.2. Recommend corrective actions that may prevent recurrence of similar incidents at other installations.

5.3. Prepare and submit an incident report for the Wing/Installation Commander's signature.

5.4. Draft an environmental NOTAM containing lessons learned and recommendations to prevent recurrence and submit with final report.

5.5. Chairperson requests waivers or extensions through HQ PACAF/CE.

5.6. Chairperson briefs EIIB findings to EPC/ESOHC.

5.7. Chair person briefs HQ PACAF/CV on Category 1 incidents.

6. Environmental Flight Responsibilities:

6.1. Notify HQ PACAF/CEVQ and appropriate NAF/CE immediately after an environmental incident occurs.

6.2. Act as a facilitator in forming the EIIB.

6.3. Provide PACAF/CEV with EIIB Chairman's Rank/Grade, DSN phone number, Fax number, and Email information.

6.4. Advise EIIB on environmental issues as needed.

6.5. Chair Category 4 incident EIIB's IAW **Figure 2**.

6.6. Hold Category 4 incident EIIB findings/reports for 3 years IAW **Figure 2**.

7. Staff Judge Advocate (SJA) and Office of Special Investigations (OSI) Responsibilities:

7.1. Jointly clear an incident site and/or background data before any EIIB proceeds.

7.1.1. Conduct OSI investigation separate and distinct from an EIIB evaluation; however both investigations may be conducted simultaneously.

7.1.2. Notify the EIIB members they are cleared to proceed once OSI provides clearance and/or legal restrictions have been identified.

7.2. Brief all EIIB members prior to beginning the EIIB evaluation with basic training on investigation techniques. EIIB members must be informed that the EIIB is not a criminal or legal investigation, but an investigation to determine the factors leading to an environmental incident to prevent its recurrence and to improve response procedures to reduce the impact of incidents which may occur in the future.

8. Public Affairs Responsibilities:

8.1. Evaluate need for public release of incident and prepare questions and answers for potential media queries. Coordinate responses to anticipated questions with appropriate agencies/directorates before EIIB releases any findings.

8.2. Publicize investigation findings through base newspapers, topics for commander's call and AFRTS outlets to educate personnel on preventing future occurrences.

9. Bioenvironmental Engineer Responsibilities:

9.1. Provide sampling, analysis, and monitoring support to EIIB on request.

9.2. Advise the EIIB on human health and environmental exposure hazards.

10. Wing Safety Responsibilities:

10.1. Investigate reportable mishaps IAW AFI 91-204, Mishap Reporting and Investigations.

10.2. Assist the EIIB on safety issues as needed.

11. Logistics Responsibilities: Petroleum Oil and Lubricant (POL) mishap reporting will be accomplished IAW AFI 23-201, Fuels Management, and Fuels Policy Document 97-02. Fuels management will report spills, 100 gallons or greater, with the exception of Alaska who will report 55 gallons or greater, by telephone to HQ PACAF/LGSF as soon as possible and the appropriate NAF according to local procedures. A message detailing the incident will follow within 24 hours of verbal notification.

12. Category Determinations:

12.1. For purposes of the EIIB, POL release means the total quantity of POL released from the confines of the equipment or structure designed to hold the product. The category of the spill is based on the total quantity released--not the final quantity lost to the environment.

12.2. Reportable Quantity (RQ) References. Individual chemicals are listed on the Extremely Hazardous Substance list in 40 CFR 355.40, appendixes A & B and the Comprehensive Environmental Response, Compensation, and Liability Act list in 40 CFR 302.4, or the most current Environmental Governing Standards for overseas installations.

12.3. Wing/Installation Commander or designee will determine the category of an incident based on **Figure 1**. Some incidents may fit multiple columns. Check each column and select worst case category rating (category 1 being worst).

12.4. The Wing/Installation Commander or designee will appoint EIIB members who will report according to **Figure 2**.

Figure 1. Category Determinations.

Category	Fine	Cost	POL	Risk	Inspection	Other
Category 1	Receipt of enforcement action with a fine over \$200,000	Substance release costing over \$200,000 to mitigate	POL release of over 10,000 gallons	*Release above RQ damaging the environment or posing a serious threat to public health, or safety	*Receipt of a repeat enforcement action (EA) from an inspection within 12 months	Incident is sensitive or serious enough to warrant full investigation
Category 2	Receipt of enforcement action with a fine between \$50,000 and \$199,999	Substance release costing between \$50,000 and \$199,999 to mitigate	POL release of at least 1,000 but less than 10,000 gallons	*Release above RQ that endangers the environment or poses a threat to public health, or safety	*Receipt of a repeat EA from an inspection within 12-36 months	The base being party to a law suit for environmental reasons
Category 3	Receipt of enforcement action with a fine of less than \$50,000	Substance release costing between \$5,000 and \$49,999 to mitigate	POL release at least 100 but less than 1,000 gallons	Release above RQ that does not damage nor endanger public health, safety, or environment		
Category 4		Substance release costing under \$5,000 to mitigate	Any POL release less than 100 gallons			

Figure 2. Minimum EIIB Membership and Reporting Requirements.

Category	Chair	Other Representatives	Reporting Requirements
Category 1	*0-6 or GS-15 from uninvolved unit	Environmental Flight Rep, Rep from affected functional area, SG, SJA, and OSI	Brief and report to PACAF / CV; info copies to HQ PACAF CE/SG/PA/JA /LG; appropriate NAF office
Category 2	*0-5 or GS-14 from uninvolved unit	Environmental Flight Rep, Rep from affected functional area, SG, SJA, and OSI	Report to PACAF/CV; info copies to HQ PACAF CE / SG/PA/JA/LG; appropriate NAF office
Category 3	*0-4 or GS-12/13 from uninvolved unit	Others as required by Installation CC	Report to PACAF/CE; info copies to HQ PACAF SG / PA/JA/LG
Category 4	Environmental Flight	Others as required by Installation CC	Report kept in CES/CEV for 3 years

13. Report Preparation: Incident reports will contain the following information:

- 13.1. Narrative description of the incident, including photographs and sketches when appropriate.
- 13.2. Date and time of incident. Discuss method of activating emergency response plans. Include time of incident notification to national, regional, state, and local officials if applicable. Include copies of local news media reports resulting from the incident.
- 13.3. Location of the incident, nature of terrain, weather conditions during response, and estimate of affected area. Include actual damage and/or potential threat to human life, property, plant, or animal life.
- 13.4. Type and estimated amount of release to include Material Safety Data Sheets.
- 13.5. Cause of the incident and recommendations to prevent recurrence.
- 13.6. Actions taken to eliminate pollution source and removal of any pollutant.
- 13.7. Emergency Response Lessons. List specific issues that were key to the success or any deficiency noted during the response operation. Address problems encountered during implementation of the emergency response plan and how the plan should be modified to prevent recurrence. Include the need for special equipment or training.
- 13.8. Cost and estimated completion date of remedial actions.
- 13.9. Proposed environmental NOTAM containing lessons learned and recommendations to prevent recurrence. Submit electronically with final report, using Microsoft Word. Example of NOTAMs can be found on website <http://www.hqpacaf.af.mil/cc/cevindx/EIIB's.htm>.

14. EIIB Process Management Checklist: After an Environmental incident occurs use the following checklist:

<u>Task</u>	<u>Suspense</u>
1. Report the incident to the Wing/Installation Commander, Environmental Flight, SJA, OSI, and PA	Immediately
2. Report the incident to the appropriate Numbered Air Force in accordance with Host Nation Environmental Governing Standards	Immediately
3. Obtain joint legal/OSI clearance	48 hours after incident
4. Wing/Installation Commander determines category level and need for EIIB	24 hours after incident
5. Wing/Installation Commander appoints EIIB and initiates investigation	3 days after incident
6. EIIB completes investigation	14 days after appointment
7. Wing/Installation Commander forwards final report to HQ PACAF and info copy to appropriate Numbered Air Force	14 days after investigation is complete

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